

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

FILED
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2005 FEB 28 P 3:47

ANTHONY BAYAD,

Plaintiff,

v.

JOHN CHAMBERS, PATRICIA RUSSO,
ANTHONY SAVASTANO, and
CARL WIESE,

Defendants.

U.S. DISTRICT COURT
DISTRICT OF MASS.

CIVIL ACTION NO. 04-10468-GAO

DECLARATION OF JOHN CHAMBERS

I, JOHN CHAMBERS, declare under the pains and penalties of perjury, pursuant to 28 U.S.C. § 1746, the following:

1. I am the President and Chief Executive Officer of Cisco Systems, Inc. ("Cisco"). I have worked at Cisco's San Jose, California facility since 1991.
2. I submit this declaration in support of the Motion for Summary Judgment of myself, Anthony Savastano and Carl Wiese in connection with the captioned matter.
3. During the period May 2000 to May 2001, Cisco employed approximately 40,000 individuals. Cisco now employs approximately 35,000 individuals.
4. I have no involvement with the administering or scoring of Cisco Certified Internetworking Engineer ("CCIE") certifications.
5. I do not recall ever meeting or interacting in any way with Anthony Bayad.
6. I have no personal knowledge about Mr. Bayad's employment with Cisco.

7. I have no personal knowledge concerning, and have had no involvement with, any decision regarding Mr. Bayad's employment with Cisco, the termination of his employment, or Mr. Bayad's alleged subsequent attempts to obtain re-employment with Cisco or employment elsewhere.

8. To my knowledge, Cisco has never maintained a no-hire list targeting minorities as alleged by Mr. Bayad.

9. I have no personal knowledge concerning, and have had no involvement with, any decision regarding Mr. Bayad's alleged attempts to foster any type of business relationship with Cisco or any other entity.

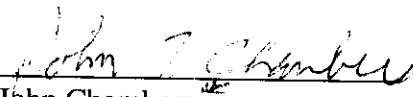
10. Although I was formerly employed by Wang Laboratories ("Wang"), while at Wang I did not know or work with Anthony Savastano.

11. I learned of Mr. Savastano's employment with Wang for the first time during the course of making inquiries necessary for me to respond to Mr. Bayad's Request for Admissions. I do not recall ever meeting Mr. Savastano, although I am informed that he has attended meetings at Cisco at which I was also present.

12. I do not recall ever meeting Carl Wiese, although I am informed that I met with Mr. Wiese once in 2003 during a Cisco sales conference.

13. I do not recall ever discussing Mr. Bayad with Mr. Savastano or Mr. Wiese, or with anyone else other than my counsel for this matter.

February 22, 2005


John Chambers